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May 9, 2025

- Sent via email -

The Honorable Lewis J. Liman
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007
LimanNYSDChambers@nysd.uscourts.gov

Re: *U.S. v. Anthony Saccavino, 24 Cr. 537 (LJL)*
Request to Seal Additional Sentencing Submission

Dear Judge Liman:

Our office represents Mr. Anthony Saccavino, who is scheduled to be sentenced before you on May 14, 2025, at 10:30 a.m., having pled guilty to Count One of Indictment 24 Cr. 537 (LJL) (the "Indictment"), which charged him with conspiracy to solicit and receive a bribe as an agent of an organization receiving federal funds, in violation of 18 U.S.C. § 371.

We have previously filed a sentencing submission on his behalf (Def. Mem., ECF No. 56). Since then, we have received additional exhibits which we would like to include for the Court's consideration. Pursuant to your Honor's Individual Practices in Criminal Cases concerning sentencing, Sec. 8(H), we are seeking to file the entire submission under seal.

Our request is made because the exhibits to be filed contain: a confidential record concerning the educational ("IESP") needs of one of his daughters (Angelina); letters confirming that both daughters are currently in therapy; and related historical medical information for Angelina. An unreacted copy of the collective submission is provided. We believe that sealing is justified because both daughters are minors and the records provided are sensitive in that they address treatment and diagnosis.

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Accordingly, we ask leave to file Mr. Saccavino's entire supplemental sentencing submission under seal, and further request that this letter-motion itself should be sealed because it reveals the confidential medical, educational and therapeutic information of minors.

Respectfully submitted,

/s/ Joseph M. Caldarera

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